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**UNITED STATE DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,  
MICK CLEARY, EUGENE ALVIS, and  
JENNIFER NELSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**DECLARATION OF KARMA M.  
GIULIANELLI IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

Judge: Hon. Virginia K. DeMarchi

I, Karma M. Giulianelli, declare as follows:

1. I am an attorney licensed to practice law in California and Colorado, and have entered an appearance in this matter. I am an attorney at Bartlit Beck LLP and represent Plaintiffs in this action.

2. I have personal, first-hand knowledge of the facts set forth in this Declaration. If called as a witness, I could and would competently testify to these facts under oath.

3. Certain documents and/or portions of documents with respect to (1) Plaintiffs' Reply in Support of Motion to Exclude Expert Testimony and supporting materials, and (2) Plaintiffs' Reply in Support of Motion to Certify Class Under Fed. R. Civ. 23(b)(2) and 23(b)(3) and supporting materials have been designated by Defendant Google LLC as "Confidential" or "Highly Confidential" pursuant to the Stipulated Protective Order entered on August 6, 2024 (ECF 107) in this matter. The following table lists the documents and/or portions of documents which contain, incorporate, and/or rely upon documents so marked:

Document	Portions to be Sealed
Plaintiffs' Reply in Support of Motion to Exclude Expert Testimony	Document in its entirety
Ex. C to Declaration of Pamela I. Yaacoub in Support of Plaintiffs' Reply in Support of Motion to Exclude Expert Testimony, <i>Csupo v. Google</i> Trial Transcript excerpts	Document in its entirety
Plaintiffs' Reply in Support of Motion to Certify Class Under Fed. R. Civ. 23(b)(2) and 23(b)(3)	Document in its entirety
Ex. A to Declaration of Karma M. Giulianelli in Support of Plaintiffs' Motion to Certify Class, <i>Csupo v. Google</i> Trial Transcript excerpts	Document in its entirety
Ex. B to Declaration of Karma M. Giulianelli in Support of Plaintiffs' Motion to Certify Class, <i>Csupo v. Google</i> Decert & Recert Order	Document in its entirety

Document	Portions to be Sealed
Ex. E to Declaration of Karma M. Giulianelli in Support of Plaintiffs' Motion to Certify Class, Bradley Nelson Deposition Transcript excerpts	Document in its entirety

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 29, 2025.

/s/ Karma M. Giulianelli

Karma M. Giulianelli